



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

AUG 26 2014

Lisa M. Cheung
Airport Planner
Passero Associates
242 West Main Street, Suite 100
Rochester, NY 14614

Re: Watertown International Airport Runway Extension and Terminal Area Development

Dear Ms. Cheung:

The U.S. Environmental Protection Agency has reviewed the Draft Environmental Assessment for Runway Extension and Terminal Area Development for Watertown International Airport. Located in Jefferson County, New York, the owner and operator of the airport is proposing a runway/taxiway extension and associated lighting, drainage, and obstruction removal improvements; and terminal area development. The extended runway will better accommodate the runway length for the regional jet aircraft providing nonstop service to Philadelphia under all weather conditions, without having to incur penalties or switch aircraft fleet; and provide the necessary terminal facilities to address passenger loads and security requirements.

EPA offers the following comments.

- Except for doing a site verification of the actual amount of wetlands and test pits for a cultural resource survey, it appears that the two alternatives that were not carried forward could have undergone the detailed evaluation. An inability to access property is not a convincing reason to screen out alternatives. Desktop tools and consultations are available to address initial estimates of potential impacts. Moreover, given the extent of the information provided in Table 2-1 for all the alternatives, EPA believes it would have been preferable to carry forward all the alternatives. The proposed action, though least costly, seems to require greater obstruction removal and more land acquisition, suggesting that a comparison of the environmental impacts for all the alternatives may prove useful.
- Please include the conformity calculations; they did not appear to be in Appendix H with the other calculations.
- EPA recommends tree replacement to offset the loss of carbon sink. Replacement could occur off airport property or through a state or national tree planting program. The replacement of the carbon sink value would not need to be scientifically rigorous, but even incremental efforts will contribute to cumulative improvement.

- We encourage the removed fencing materials be recycled, as well as any other unused construction or deconstruction materials.
- Green building features should be considered for terminal expansion. Energy Star and WaterSense information is available at the following websites:

<http://www.energystar.gov/>

<http://www.epa.gov/watersense/>

- Porous pavement should be considered for the parking area and access road. This would allow rain and snowmelt to pass through, thereby reducing the amount of runoff.

http://water.epa.gov/infrastructure/greeninfrastructure/gi_performance.cfm

Thank you for the opportunity to comment. We hope you find this information beneficial for your project. If you have any questions, please contact me at 212-637-3738 or musumeci.grace@epa.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Grace Musumeci", with a long horizontal flourish extending to the right.

Grace Musumeci, Chief
Environmental Review Section